

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

STEPHANIE MERCIER,
AUDRICIA BROOKS,
DEBORAH PLAGEMAN,
JENNIFER ALLRED,
MICHELE GAVIN,
STEPHEN DOYLE, on behalf of themselves
And all others similarly situated,

Plaintiffs,

v.

No. 12-920C
(Judge Kaplan)

THE UNITED STATES,

Defendant.

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE DOCUMENT UNDER
SEAL**

Plaintiffs, pursuant to Appendix E of the Rules of the Court of Federal Claims, move the Court for leave to file Attachment A to the Parties' recently consummated Settlement Agreement under seal.

Plaintiffs and Defendant executed a Settlement Agreement to resolve the unpaid overtime claims asserted in this action on July 8, 2021. The Settlement Agreement will be filed as an exhibit to Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and Approval of Notices of Class Action Settlement which will be filed on or about July 12, 2021. Attachment A to the Settlement Agreement is a spreadsheet which contains confidential information of each of the 3207 class members which should not be publicly disclosed including but not limited to, their names, social security numbers, class identification numbers, the amount

of their recoveries under the Settlement and the amount of Federal payroll taxes that will be withheld from the backpay portion of their recoveries.

In Paragraph 24 of the Settlement Agreement, Plaintiffs and Defendant agreed to file Attachment A under seal. If the Settlement Agreement and proposed notices are preliminarily approved by the Court, the appointed settlement administrator will establish a website dedicated to the Settlement on which information about each individual's recovery will be made available through a link to a secure portal by entering either the last four digits of their social security number or their class identification number.

Based on the foregoing, Plaintiffs request leave to file Attachment A to the Settlement Agreement under seal.

Respectfully submitted,

/s/ Michael Hamilton

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I hereby certify that on July 9, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for all parties.

/s/ Michael Hamilton